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December 1, 2024

Via ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
December 2, 2024

Re: *United States v. Shmuel Abraham*, 20-cr-00411-RA

Dear Judge Abrams:

We write to respectfully request the temporary return of the passport of Shmuel's Abraham's wife, Roiza.

As part of Shmuel Abraham's bail, his wife agreed to surrender her passport. Roiza Abraham, however, would like to be able to travel to her niece's wedding this Monday evening outside Montreal, and so we ask that the Court modify Shmuel's bail condition so as to allow the temporary return of Roiza's passport from tomorrow morning until Wednesday, December 4.

If the Court grants this request, Mrs. Abraham will re-surrender her passport by December 4th.

I reached out to both pre-trial and the assigned AUSA late last week to ask them their position on this request but, given the holiday weekend, have understandably not yet heard back.

Respectfully submitted,

/s/

Gedalia M. Stern